

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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PAUL GOODMAN,

Plaintiff,

-against-

08 CV 2851 (LLS)


MARTIN WADE, NOLAN QUAN, BLAIR MILLS,  
BROADCASTER, INC., GARY HERMAN, BRUCE  
GALLOWAY, THOMAS KIKIS, KIKIS FAMILY  
FOUNDATION, WILLOW CREEK CAPITAL  
MANAGEMENT, TRINAD CAPITAL MASTER  
FUND, LTD., AARON BROWN, ANDREW GARRONI,  
STRATEGIC TURNAROUND EQUITY PARTNERS, LP  
(CAYMAN) AND DIGITAL CREATIVE DEVELOPMENT  
CORPORATION,

Defendants.  
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PLAINTIFF'S CROSS- MOTION TO REMAND

PLEASE TAKE NOTICE that plaintiff pro se Paul Goodman, will move, and hereby moves this Court, pursuant to 28 U.S.C. §1447, for an order remanding this action to New York State Supreme Court together with the just costs and any actual expenses, including attorneys fees, together with such other and further relief as this Court deems just and proper.

Dated: June 5, 2008

  
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Paul Goodman

Plaintiff *Pro Se*  
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